

## **REMARKS**

### **A. SUMMARY OF THE AMENDMENTS**

Claims 1-35 are pending.

Claims 1-29 remain unchanged.

Claims 30-35 are new.

No new matter has been added under the present amendment.

### **B. DETAILED RESPONSE TO ACTION**

#### ***I. Rejections Under 35 U.S.C. 103(a)***

On page 2 of the Office Action, the Examiner has rejected claims 1-4 and 8-25 under 35 U.S.C. 103(a) as being unpatentable over Lein U.S. patent 5,395,257 (hereinafter referred to as "Lein") in view of Liddle *et al.* U.S. Patent 5,999,097 (hereinafter referred to as "Liddle"). The Applicant respectfully disagrees and traverses the rejection as set forth herein below.

#### **Claim 1**

The Examiner has indicated that "Lein does not explicitly disclose" the claimed feature of "each signal conducting member of the first set being provided with connection paths to a different pair of non-contiguous signal conducting members of [said] second set". Applicant does not dispute this statement.

Now, having regard to Liddle, the Examiner states firstly that "Liddle teaches (col. 2, lines 17-19) patterns of conductors 11 and 12 for connection paths between each terminal 14 and also teaches (col. 2, lines 23-25) that the connection path between



each terminal 14 and the corresponding terminal 15 can be changed even though terminal 14 remains connected to the same terminal 15.” Applicant does not dispute this statement. However, clarification of the significance of the cited passages of Liddle is in order. Specifically, it should clear from these and other passages of Liddle (including col. 2, lines 45-51) that every terminal numbered 14 (hereinafter “first terminal 14”) has two paths to the same terminal numbered 15 (hereinafter “second terminal 15”). In particular, Liddle plainly states at col. 3, lines 4-8 that “[t]he angle of each conductor 11 and 12 in the upper and lower patterns relative to the longitudinal direction of the lead member 10 is such that the start of each circuit path from a terminal 14 is aligned with the end of the circuit path at the corresponding terminal 15.” (emphasis added)

Moreover, one notes that in Liddle, the two extremities of the lead 30 (*viz.*, the set of first terminals 14 and the set of second terminals 15) are each located in physically secure areas (see col. 3, lines 20-30 of Liddle). In view of the highly secure end points of the lead 30, it would not be of any value for Liddle to seek to achieve randomness in the mapping between the terminals 14 and the terminals 15. Rather, the purpose of Liddle is to enhance the security of the lead 30 between the first terminals 14 and the second terminals 15, and this is achieved by providing a security enclosure 29 (see Fig. 3 of Liddle) within which the conductors 11, 12 are used to join the first terminals 14 to corresponding ones of the second terminals 15. To achieve his security-enhancing objective, Liddle provides the flexibility to change (at the time of manufacture) the path taken from first each first terminal 14 to the corresponding second terminal 15, so that an attacker who gains access to a signal traveling on a certain conductor 11, 12 cannot determine which first terminal 14 originally carried the signal. However, nowhere is it disclosed in Liddle that the same first terminal 14 could be connected to one of two different second terminals 15, let alone two different non-contiguous such terminals. In fact, all passages of Liddle are consistent with the opposite interpretation.

Secondly, the Examiner states that “it would have been obvious to a person of ordinary skill in the art [...] to include the connection paths and the changing of connection paths as taught by Liddle into the invention of Lein to be able to provide



connection paths to a different pair of non-contiguous signal conducting members as claimed. This is because Liddle teaches [...] a connector circuit that is adjustable so as to change the connection paths between the first and second sets of terminals [...].”

It is respectfully submitted that this aspect of the Examiner’s argument need not be addressed, since it has been shown that the cited art fails to teach or suggest at least one limitation of claim 1. Nevertheless, if it would be helpful in advancing prosecution of this application, Applicant would invite the Examiner to note that Lein is concerned with fault isolation using guard pins (see col. 2, lines 13-22 of Lein). As such, and contrary to the Examiner’s implied assertions, it would actually be against the teachings of Lein to provide a connector in one fault containment module with a connection to a connector in another fault containment module, since this would expose both fault containment modules to failure.

In view of the foregoing, it is Applicant’s respectful submission that claim 1 recites at least one feature that is neither taught nor suggested in the cited art, thus demonstrating that there is at least one criterion required for establishing a *prima facie* case of obviousness in accordance with MPEP 706.02(j) which has not been satisfied<sup>1</sup>. The Examiner is therefore respectfully requested to withdraw his rejection of claim 1, which is believed to be in condition for allowance.

#### Claims 2-4 and 8-13

Each of claims 2-4 and 8-13 is dependent on claim 1 and therefore includes all of the features of claim 1, including those already shown to be absent from the combination of Liddle and Lein. As such, and for the same reasons as those set forth above in support of claim 1, it is respectfully submitted that claims 2-4 and 8-13 are in condition for allowance and the Examiner is respectfully requested to withdraw the rejection of claims 2-4 and 8-13.

---

<sup>1</sup> For the Examiner to establish a *prima facie* case of obviousness, three criteria must be considered: (1) there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the



Claims 14-23

Claim 14 includes language similar to that of claim 1. Claims 15-23 are dependent on claim 14. As such, and for the same reasons as those set forth above in support of claim 1, it is respectfully submitted that claim 14 (and its dependent claims 15-23) are in condition for allowance and the Examiner is respectfully requested to withdraw the rejection of claims 14-23.

Claims 24-25

Claim 24 includes language similar to that of claim 1. Claim 25 is dependent on claim 24. As such, and for the same reasons as those set forth above in support of claim 1, it is respectfully submitted that claim 24 (and its dependent claim 25) are in condition for allowance and the Examiner is respectfully requested to withdraw the rejection of claims 24-25.

***II. Comments on Allowable Subject Matter***

Allowance of claims 27-29 is gratefully acknowledged.

Potential allowability of claims 5-7 and 26 is gratefully acknowledged. Accordingly, Applicant has added claims 30, 31, 32 and 33, which correspond, respectively, to claim 5 (rewritten in independent form including the features of claims 2 and 3), claim 6 (rendered dependent on claim 30), claim 7 (rendered dependent on claim 30) and claim 26 (rewritten in independent form including the features of claim 25).

---

reference teachings, (2) there must be a reasonable expectation of success, and (3) the prior art references must teach or suggest all of the claim limitations. MPEP §§ 706.02(j), 2142 (8<sup>th</sup> ed.).



***III. Comments on New Claims 34 and 35***

New claim 34 is dependent on claim 1. As such, and for the same reasons as those set forth above in support of claim 1, it is respectfully submitted that claim 34 is in condition for allowance.

New claim 34 is dependent on claim 27, which was found to be allowable. As such, it is respectfully submitted that claim 35 is also in condition for allowance.

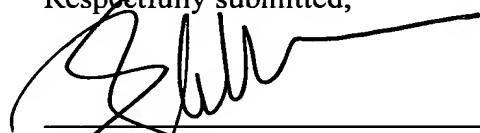


## **CONCLUSION**

In view of the foregoing, Applicant is of the view that claims 1-35 are in allowable form. Favourable reconsideration is requested. Early allowance of the Application is earnestly solicited.

If the application is not considered to be in full condition for allowance, for any reason, the Applicant respectfully requests the constructive assistance and suggestions of the Examiner in drafting one or more acceptable claims pursuant to MPEP 707.07(j) or in making constructive suggestions pursuant to MPEP 706.03 so that the application can be placed in allowable condition as soon as possible and without the need for further proceedings.

Respectfully submitted,



---

Sapiro Zlobec  
Agent for Applicant  
Reg. No. 52,535

DATE: July 21, 2006

SMART & BIGGAR  
1000 De La Gauchetière Street West  
Suite 3300  
Montreal, Quebec H3B 4W5  
CANADA  
Telephone: (514) 954-1500  
Facsimile: (514) 954-1396